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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

CASE NO. 3:23-cv-03417-VC

**DECLARATION OF RYA FISHMAN IN  
SUPPORT OF PLAINTIFFS' REPLY TO  
DEFENDANT META PLATFORMS, INC.'S  
OPPOSITION TO MOTION TO AMEND  
CASE MANAGEMENT SCHEDULE**

I, Rya Fishman, declare as follows:

1. I am a paralegal at the Joseph Saveri Law Firm, counsel for Plaintiffs in the above-captioned action.

2. I have personal knowledge of the matters stated herein and, if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. § 1746 and Local Rule 6-3 in support of Plaintiffs' Reply to Defendant Meta Platforms, Inc.'s Opposition to Motion to Amend Case Management Schedule.

3. On August 29, 2024, I attended a meet-and-confer videoconference with counsel for Meta Platforms, Inc. in connection with the above-referenced action. Also in attendance for Plaintiffs' counsel were Holden Benon, Aaron Cera, Matthew Butterick, Alex Sweatman, Mohammed Rathur, and James Ulwick.

4. Plaintiffs' counsel did not state during the August 29 meet-and-confer that Meta did not need to produce additional Llama 3 data beyond the "Libgen" dataset. Rather, Plaintiffs' counsel explained that datasets containing copyrighted literary works were Plaintiffs' priority at that time, as opposed to datasets comprising social media commentary. Plaintiffs' counsel also asked Meta's counsel to describe the universe of what was being withheld, but Meta's counsel was unable to provide a meaningful response during the meet-and-confer.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 4th day of October 2024 in San Francisco, California.

By: /s/ Rya Fishman  
Rya Fishman